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STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF STATE COUNSEL LITIGATION BUREAU

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January 25, 2023

BY ECF

The Honorable Kenneth M. Karas United States District Judge Southern District of New York 300 Quarropas Street White Plains, New York 10601-4150

Re: Stanbro v. Palou, et al, 20 Civ. 1591 (KMK)

Dear Judge Karas:

This Office represents Defendant Leonardo in the above-referenced action. I write to respectfully request that the Court allow Defendants' objections to Plaintiff's proposed judgment filed on January 23, 2023 to be submitted on or before February 1, 2023. I do not recall any deadline to object being set by the Court for objections, but have not yet received the transcript of the January 19 proceedings to confirm this. S.D.N.Y. Local Rule 77.1 provides for four days' notice of settlement. Preliminarily, there is a typographical error concerning the punitive damages award against Defendant Deal and it appears that Plaintiff's request for post-verdict pre-judgment interest is not allowed for Section 1983 claims, but would like more time to further research the issue as well as any other potential issues.

We thank the Court for its consideration.

Granted.

So Ordered.

1/25/23

cc:

Counsel of Record By ECF

Respectfully submitted,

Jeb Harben

Jeb Harben Assistant Attorney General Jeb.harben@ag.ny.gov

All parties have consented to this deadline.